

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

1. ISHANTA SHOALS, an individual,)	
)	
Plaintiff,)	
vs.)	Case No. 16-CV-220-RAW
)	
1. STATE OF OKLAHOMA, ex rel.)	
OKLAHOMA DEPARTMENT OF)	
HUMAN SERVICES, a governmental)	
agency,)	
2. MICHAEL KINDRICK, an individual,)	
3. ZANE GRAY, an individual,)	
)	
Defendants.)	

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW the Plaintiff, Ishanta Shoals, by and through her attorney of record, Charles C. Vaught of *Armstrong & Vaught, P.L.C.*, and the Defendants, by and through their attorneys of record, John E. Douglas, Stacy Pederson, and Emily B. Fagen of *Assistant General Counsel, Department of Human Services*, and hereby give notice pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii), that Plaintiff dismisses with prejudice the following enumerated counts and/or claims pled in her Second Amended Complaint: (a) Count I – Race Discrimination in Violation of Title VII; (b) Count II – Race Discrimination in Violation of 42 U.S.C. §§ 1981 & 1983; (c) Count III – Retaliation in Violation of Title VII; and (d) Count IV – Retaliation in Violation of 42 U.S.C. §§ 1981 & 1983. Plaintiff will continue to litigate her remaining claim, as follows: (a) Count V – First Amendment Retaliation in Violation of 42 U.S.C. § 1983. Through this dismissal, each party is to bear their / its own costs and attorney’s fees.

Respectfully Submitted,

Armstrong & Vaught, P.L.C.

/s/ Charles C. Vaught

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Attorneys for Defendants

*Signed by Filing Attorney with permission
of Defendant's attorney.*

CERTIFICATE OF SERVICE

I hereby that on the 15th day of February, 2017, I electronically transmitted the attached document to the Clerk of Court using the ECF system for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

John E. Douglas: John.Douglas@okdhs.org

Stacy Pederson: Stacy.Pederson@okdhs.org

Emily Fagan: Emily.Fagan@okdhs.org

s/ Charles C. Vaught

Charles C. Vaught